

**McDaniel, Clay**

**From:** Hynum, Tammie  
**Sent:** Thursday, May 28, 2009 1:17 PM  
**To:** Cusher, Annette; McDaniel, Clay  
**Cc:** Rich, Jay; Greenway, Cindy; Rigg, Jim  
**Subject:** FW: Former Cedar Chemical Facility - Addendum to RTC 2  
**Importance:** High

Annette/Clay,

The only outstanding item remaining on the Wormald Investigation Report was the survey map. Please take a look at the attached explanation and let me know soon if this meets your needs.

Thanks,

Tammie

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**From:** Alexander, Leslee [mailto:Leslee.Alexander@aecom.com]  
**Sent:** Thursday, May 28, 2009 12:39 PM  
**To:** Benefield, Ryan; Hynum, Tammie  
**Cc:** johnperkins@tycoint.com; Ann Faitz  
**Subject:** Former Cedar Chemical Facility - Addendum to RTC 2  
**Importance:** High

Mr. Benefield and Ms. Hynum,

Attached please find AECOM's Addendum to Response to Comments on the Wormald Site Investigation Report (April 27, 2009). The hard copy of this document was sent today via FedEx for delivery tomorrow morning.

Please feel free to contact me at [leslee.alexander@aecom.com](mailto:leslee.alexander@aecom.com) or via telephone at 864-234-2282 if you have any questions.

Sincerely,  
 Leslee

**Leslee J. Alexander, PG**  
 Hydrogeologist  
 D 864.234.2282 C 864.423.2107  
[leslee.alexander@aecom.com](mailto:leslee.alexander@aecom.com)

**AECOM**  
 10 Patewood Drive  
 Building VI, Suite 500  
 Greenville, SC 29615  
 T 864.234.3000 F 864-234-3069  
[www.aecom.com](http://www.aecom.com)

Please note: My e-mail has changed to [leslee.alexander@aecom.com](mailto:leslee.alexander@aecom.com). Please update your address books accordingly.

Earth Tech's parent company, AECOM Technology Corporation, as it evolves to better serve its clients, is changing the name of Earth Tech, Inc. to AECOM Technical Services, Inc. Earth Tech's legal structure will not change and Earth Tech's employees will be employees of AECOM Technical Services, Inc. As a member of AECOM's environmental practice, we are able to offer expanded depth and breadth of services drawing on the experience and expertise of AECOM Technical Services and AECOM's environmental staff.

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6/1/2009

**AECOM**

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May 28, 2009

Mr. Ryan Benefield  
Chief of Hazardous Waste Division  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Subject: **Addendum to Response to Comments on the Wormald Site Investigation Report (April 27, 2009)**  
**Tyco Safety Products – Former Cedar Chemical Facility**  
**Helena – West Helena, Arkansas**  
**State EPA ID No. ARD990660649**

Dear Mr. Benefield:

This letter is provided as an addendum to AECOM's May 21, 2009 response to written comments on the *Revised Wormald Site Investigation Report (SIR)* (AECOM, April 27, 2009). The comments by the Arkansas Department of Environmental Quality (ADEQ) were transmitted in correspondence to AECOM dated May 4, 2009. As discussed in the last paragraph of the May 21, 2009 response, additional data received from Smith and Weiland Surveyors and Engineers, Inc. on May 21, 2009 indicated a potential discrepancy with AECOM's basemap that needed to be corrected prior to submittal of the revised Figure 2 and Appendix E of the SIR. A description of the discrepancy is provided in the paragraphs below, along with the measures taken by AECOM to rectify the situation.

AECOM, on behalf of Tyco Safety Products – Wormald U.S., Inc., initially performed a review of previous and current documents detailing investigation work performed at the Former Cedar Chemical Facility ("Facility"). During this review, AECOM noted that certain survey data needed for its investigation was not shown in either the *Facility Investigation Report* (EnSafe, Inc., 1996) (EnSafe FIR) or the *Current Conditions Report* (Geomatrix, 2007)(CCR). AECOM made several attempts to locate survey data for the Facility; however, these attempts were unsuccessful. Therefore, in an effort to obtain spatial data for the Facility, AECOM digitized pertinent features and sample locations from maps provided in the FIR and CCR.

Prior to the Wormald Site Investigation, AECOM subcontracted Smith and Weiland Surveyors and Engineers, Inc. to locate historic soil sample 3SB-6 and establish 5 proposed sampling locations (TSB-1 through TSB-5), which was done and provided to AECOM.

On May 11, 2009, AECOM contacted the surveyors to obtain a signed and stamped gridded survey map, as requested by the ADEQ in comments dated May 4, 2009. The surveyor needed several extension of time to provide the map and finally, after being contacted by AECOM on several occasions, the surveyor informed AECOM on May 18<sup>th</sup> that the survey crew had not

surveyed the points in reference to State Plane Coordinate System (SPCS) North American Datum 1983 (NAD83) as requested, but in reference to their previously established grid system for the Facility. The survey crew went back to the Site the week of May 18, 2009 and re-surveyed off-site wells MW-8 and MW-10 in reference to SPCS NAD83. The surveyor subsequently used these locations to tie the existing grid to SPCS NAD83 and provided a stamped and signed gridded survey map to AECOM on May 21, 2009. However, AECOM noticed that survey coordinates for sample locations TSB-1 through TSB-5 were not the same as those provided to the surveyors by AECOM. According to the surveyor, the differences may have been the result of the digitizing process. As a result, AECOM obtained color imagery of the Facility and surrounding area from TerraServer - USA, an online provider of digital imagery. Adjustments to the basemap were made based on the imagery, which was geo-referenced to the SPCS NAD83.

Figure 2 of the *Revised SIR* (AECOM, April 27, 2009) was modified based on the information obtained from the surveyor. The imagery is used as the basemap for Revised Figure 2, which shows surveyed locations of existing monitoring wells and soil borings TSB-1 through TSB-5 in addition to soil sample results. The signed and stamped gridded survey map provided by Smith and Weiland Surveyors and Engineers, Inc. has been added to the *Revised SIR* as Appendix E.

In conclusion, AECOM believes the surveyed coordinates of sample locations TSB-1 through TSB-5, as provided by the registered professional land surveyor, to be accurate as shown in Revised Figure 2 and Appendix E. Revised Figure 2 and Appendix E for the *Revised Wormald Site Investigation Report* are provided as change-out pages in Attachment A to this letter. An electronic copy of the full report is also provided on cd. If you have any questions or require additional information, please contact me at 864-234-2282 or Ms. Ann Faitz at (501)831-5637.

Sincerely,

**AECOM**



Leslee J. Alexander, P.G.  
Project Manager

c: Mr. Dara Hall, ADEQ Counsel (letter only)  
Mr. John Perkins, Tyco Safety Products  
Ms. Ann Faitz, Tyco Counsel  
Mr. Allan Gates, HCC legal counsel  
Mr. Joe Ghormley, Exxon legal counsel  
Project File 104366

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**ATTACHMENT A**  
**REVISED WORMALD SITE INVESTIGATION REPORT - CHANGEOUT PAGES**

### Change-out pages for the Revised Wormald Site Investigation Report

Errata pages are included to replace those provided in the April 27, 2009 *Revised Wormald Site Investigation Report*. Please replace the pages in your copy of the *Revised Wormald Site Investigation Report* with the pages provided in this submittal as described in the table below.

Section	Original Page Number(s)	Replacement/New Page Number(s)	Description of Change
Figures	Figure 2	Figure 2	Figure 2 was revised based on new information provided by the surveyor on May 21, 2009 as detailed in the text of this submittal.
Appendix E	NA	NA	A stamped and signed gridded survey map was added as Appendix E in response to comments received from the ADEQ in a letter dated May 4, 2009.

**NOTES:**

ADEQ – Arkansas Department of Environmental Quality

NA – Not Applicable





**LEGEND:**

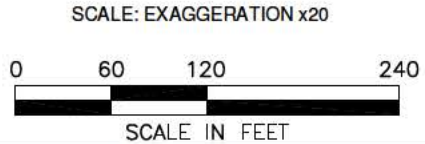
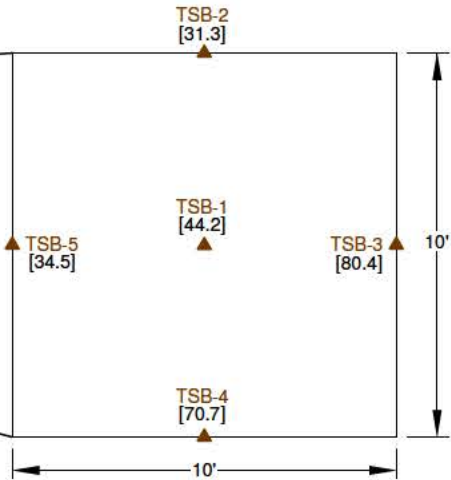
- MW-19 ● MONITORING WELL LOCATION
- TSB-1 ▲ TYCO 2009 SOIL BORING LOCATION
- [44.2] DINOSEB CONCENTRATION IN SUBSURFACE SOIL - 4 TO 8 FEET BGS (mg/kg)

**NOTES:**

- BGS - BELOW GROUND SURFACE
- mg/kg - MILLIGRAMS PER KILOGRAM
- MCL - MAXIMUM CONTAMINANT LEVEL
- MSL - MEDIUM-SPECIFIC SCREENING LEVEL
- NAD83 - NORTH AMERICAN DATUM 1983
- SSL - SOIL SCREENING LEVEL
- 1. THE EPA REGION 6 MSL FOR DINOSEB IN INDUSTRIAL SOIL IS 620 mg/kg.
- 2. THE EPA REGION 6 MCL-BASED SSL FOR DINOSEB IS 0.051 mg/kg.
- 3. THE HIGH RESOLUTION COLOR IMAGERY WAS OBTAINED FROM TERRASERVER-USA USING GLOBAL MAPPER SOFTWARE.

SOIL BORING ID	HORIZONTAL SURVEY COORDINATES	
	NORTHING	EASTING
TSB-1	1989250.59	1718138.22
TSB-2	1989254.56	1718141.32
TSB-3	1989247.54	1718142.13
TSB-4	1989246.52	1718135.13
TSB-5	1989253.86	1718134.28

ALL LOCATIONS ARE REFERENCED TO ARKANSAS STATE PLANE COORDINATE SYSTEM NAD83.



**AECOM**

**FIGURE 2**  
**RESULTS FOR DINOSEB IN SUBSURFACE SOIL**  
**AT SITE 3**

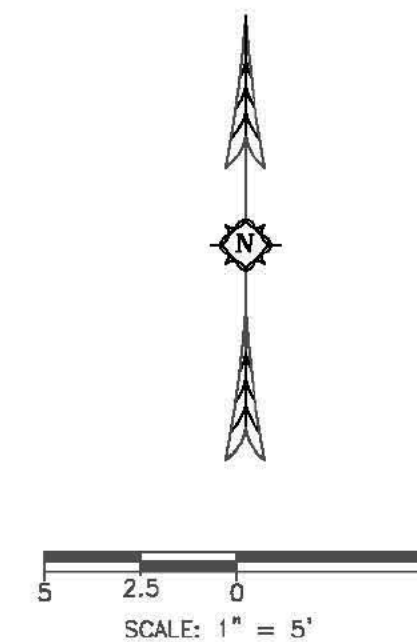
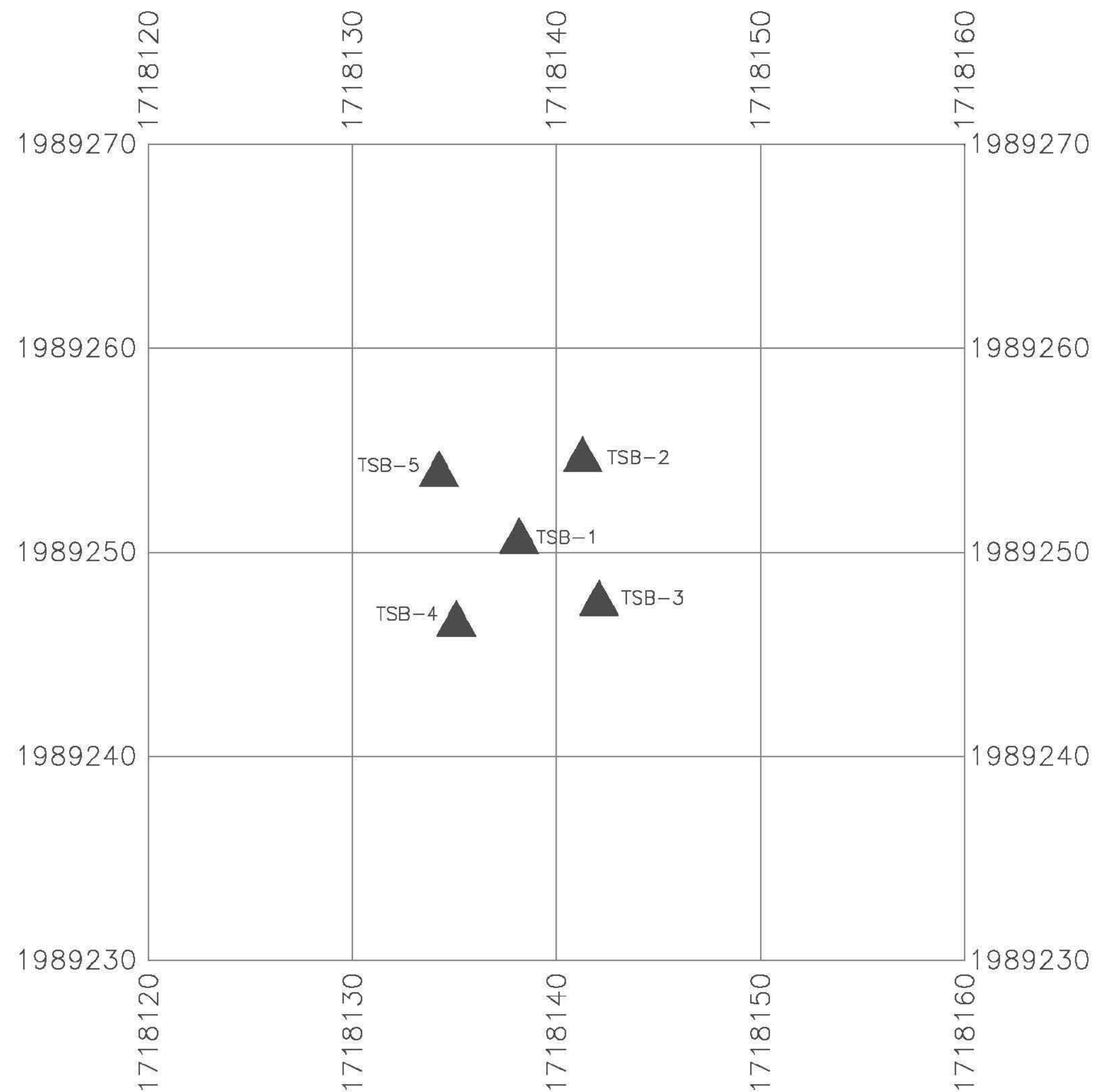
FORMER CEDAR CHEMICAL FACILITY  
HELENA - WEST HELENA, ARKANSAS

MAY 2009

104336



**APPENDIX E**  
**SURVEYOR MAP**



5-21-09

TERRY EUGENE SMITH  
REGISTERED PROFESSIONAL LAND SURVEYOR  
REG. NO. PLS-2632  
STATE OF MISSISSIPPI

BORING ID	HORIZONTAL SURVEY COORDINATES	
	NORTHING	EASTING
TSB-1	1989250.587	1718138.217
TSB-2	1989254.564	1718141.321
TSB-3	1989247.536	1718142.126
TSB-4	1989246.525	1718135.132
TSB-5	1989253.863	1718134.282

ALL LOCATIONS ARE REFERENCED TO ARKANSAS  
STATE PLANE COORDINATE SYSTEM NAD83

CEDAR CHEMICAL COMPANY  
HELENA, ARKANSAS  
WELL LOCATION MAP

SMITH & WEILAND  
SURVEYORS AND ENGINEERS, INC.  
337 DELTA AVENUE  
CLARKSDALE, MISSISSIPPI 38614  
PHONE (662) 627-4833 FAX (662) 627-4933

SCALE:  
1" = 5'  
MAY 2009

DRAWN BY: DAN  
APPROVED BY: TES